



Mayor Ron Gonzales &
Members of the Coyote Valley Specific Plan Task Force
801 North First Street
San Jose, CA 95110

August 11, 2005

RE: July 1, 2005 CVSP EIR Project Alternatives Memo

Dear Mayor Gonzales & Task Force Members:

On behalf of Greenbelt Alliance, the Bay Area's leading land conservation and urban planning advocacy organization, I would like to express our concerns about the July 1, 2005 memo on Environmental Impact Report (EIR) project alternatives for the Coyote Valley Specific Plan (CVSP) written by Stephen Hasse, Director of Planning, Building and Code enforcement.

The language of the memo demonstrates an apparent assumption by the Planning Department that the "preferred alternative" for the CVSP is environmentally superior to other alternatives. For example, in the description of the "Alternate Internal Transit System Alignments" alternative, the memo states that alternate transit systems may result in more vehicle trips, increased impervious surfaces (presumably leading to water quality impacts) and negative air quality impacts. The memo does not mention the very real possibility that, compared to the preferred alternative, a different transit alternative would make public transit more accessible to future Coyote Valley residents and workers and have better connections to transit outside of Coyote Valley, thereby increasing transit use and reducing auto dependency. Such results would almost certainly make the alternative environmentally superior to the preferred option.

Assumptions about the environmental superiority of the preferred alternative are pervasive throughout the memo. Making presumptions about the environmental superiority of the preferred alternative could well result in a biased environmental analysis. Instead of being an analysis in which the deck is stacked against alternative options, the CVSP EIR should be an objective analysis of multiple options. An objective analysis is the only way to determine the most environmentally sound approach to development in Coyote Valley.

Greenbelt is also concerned about the stated objectives and description of the "Greenbelt Alliance" alternative. We are very pleased that an alternative based on some of the principle features of *Getting It Right*, our award winning vision for Coyote Valley, is

being suggested for inclusion in the EIR. However, we are concerned that the memo suggests an analysis of “school location and student generation numbers suggested by stakeholder groups” be included in the Greenbelt Alliance alternative. For many months, Greenbelt Alliance has proposed that an alternative based on the “framework components” of *Getting It Right* be included in the EIR. These framework components include an urban design based on a grid street system, a flood management plan based on a Fisher Creek Greenway and an internal transit system based on a central spine with bus loops and that links up with both Caltrain and VTA light rail for transit access outside Coyote Valley. Other more “fine grain” components – including the location of schools, the number of schools, and specific locations for housing, employment and health clinics – are not fundamental to the Greenbelt Alliance vision for Coyote Valley. Including analysis of fine grain components in the Greenbelt Alliance alternative will potentially make it more difficult to draw out any environmental superiorities that the framework components of *Getting It Right* have over the preferred alternative’s framework components. Therefore, Greenbelt Alliance requests that the school location and student generation numbers analysis be dropped from the so-called Greenbelt Alliance alternative.

The City of San Jose has an opportunity to make Coyote Valley a model for how to do large-scale greenfield development in an environmentally responsible manner. To take advantage of this opportunity, objective environmental analysis of the preferred alternative and the realistic options to the preferred alternative is essential. If environmentally superior approaches are found during this analysis, the specific plan should be modified to include the superior options. Biasing the analysis in the preferred alternative’s favor, as the memo indicates may happen, will significantly hinder the capacity to identify environmentally superior alternatives and incorporate them into the plan.

Greenbelt Alliance encourages you to ensure that the environmental review of the CVSP is as objective as possible.

A copy of this letter has been addressed directly to Stephen Hasse.

Sincerely,

Jeremy Madsen
Field Director

CC: Joseph Horwedel, San Jose Planning Department
Laurel Prevetti, San Jose Planning Department
Darryl Boyd, San Jose Planning Department
Members of the San Jose City Council